

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARA Z. UNDERWOOD, M.D.,	:	CASE NO. 02-CV-2714
	:	
Plaintiff	:	
	:	
v.	:	
	:	
THE PAUL REVERE INSURANCE GROUP,	:	
and its successor, agent or assign	:	
THE UNUM PROVIDENT CORPORATION,	:	
	:	
and	:	
	:	
THE PENN MUTUAL LIFE INSURANCE	:	
COMPANY,	:	
	:	
and	:	
	:	
CIGNA GROUP INSURANCE & LIFE	:	
INSURANCE COMPANY OF NORTH	:	
AMERICA,	:	
	:	
Defendants	:	
	:	

**NOTICE OF MOTION
FOR EXTENSION OF DISCOVERY**

Defendant, The Penn Mutual Life Insurance Company ("PennMutual"), by and through its undersigned attorneys, Earp Cohn P.C., 1725 Spruce Street, Philadelphia, PA 19103-6149, hereby moves on behalf of itself and the other Defendants in this matter, The Paul Revere Life Insurance Company, CIGNA Group Insurance and Life Insurance Company of North America, for a sixty-day (60) day extension of the dates in the Scheduling Order in the above-captioned matter. Plaintiff's counsel consents to this request, and all Defendants join in the motion. Accordingly, this motion is uncontested.

In support of this motion, PennMutual submits the Certification of Kathryn R. Renahan and a proposed form of Amended Scheduling Order.

Respectfully submitted,

KATHRYN R. RENAHAN (45597)
CAROL SCHULER HARDING (67142)

EARP COHN P.C.
1725 Spruce Street
Philadelphia, PA 19103-6149
(215) 963-9520

Attorneys for Defendant
Penn Mutual Life Insurance Company

Dated: November 25, 2002